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By ECF and E-Mail

Honorable Frederic Block
Senior U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Jonathan Deutsch*, 18 Cr. 502 (FB)

Dear Judge Block,

I write to respectfully beg the Court to adjourn the trial in this matter to January so that Mr. Deutsch, who is facing a 15-year mandatory minimum sentence if convicted, may be effectively represented by counsel. We will not be able to provide effective representation if the trial goes forward on December 16, 2019, as scheduled.

It is one week before trial. Despite this Court's urging, and our requests for rolling production, the government has not yet provided any 3500 material or *Giglio* material. One defense counsel, Mr. Sundaram, began a jury trial today before Judge Matsumoto that may last all week. I will be in Boston on Wednesday and Thursday of this week for the oral argument in the death penalty appeal before the First Circuit in *United States v. Tsarnaev*, 16-6001. Even assuming the government provides the 3500 and *Giglio* later today, this leaves a single counsel (me) only two weekdays and the weekend to fully investigate the four minor witnesses and file any necessary motions under Rule 412 regarding their cross-examination; prepare to cross-examine the government's expert witness; prepare to cross-examine any law enforcement witnesses (at this stage, we do not know whether or who those witnesses will be); and deal with any additional issues that may arise at this pre-trial stage.

We understand that the government does not wish to postpone the trial. However, this matter was at least partially in their control: they were aware of our serious scheduling difficulties, and could have provided these materials sooner, had they wished the trial to go forward.

Given the seriousness of this case, Mr. Deutsch deserves the most vigorous defense. We would like to provide it, but are not able to do so in this time-frame.

Respectfully submitted,

_____/s/_____

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cc: AUSA Megan E. Farrell
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